EXHIBIT 71

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OHIO
EASTERN DIVISION

- - -

IN RE: NATIONAL PRESCRIPTION OPIATE LITIGATION	:	MDL NO. 2804
THIS DOCUMENT RELATES TO ALL CASES:	:	CASE NO. 1:17-MD-2804
	:	Hon. Dan A. Polster

- - -

Thursday, December 13, 2018

- - -

HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER CONFIDENTIALITY REVIEW

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Videotaped deposition of SHAUN ABREU, taken pursuant to notice, was held at the law offices of Locke Lord, LLP, Brookfield Place, 200 Vesey St., 20th Floor, New York, New York 10281-2101, beginning at 9:06 a.m., on the above date, before Amanda Dee Maslynsky-Miller, a Certified Realtime Reporter.

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GOLKOW LITIGATION SERVICES
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(Whereupon, Exhibit Schein-Abreu-6, Verification Team Overview; July 2015, was marked for identification.)

- - -

BY MR. MIGLIORI:

Q. Elia.

Who is she?

A. She works on my team.

Q. Do you recall -- it's a July -- it's Exhibit Number 6. It's a July 2015 PowerPoint, verifications team overview.

Do you remember preparing this?

A. 2015? I'm sure I did. I don't recall specifically.

Q. That's you on the front cover, anyway?

A. Yes.

Q. And it really goes into the verification component of suspicious orders, right? The second page is the licensing requirements?

A. Yes.

Q. And so part of verification is that you have to make sure that your doctors and customers, where applicable, maintain state licensure, correct?

A. Correct.

Q. Do you know if Ohio -- it says here, Example, Ohio.

Are you familiar with the additional state requirements of state licensure in Ohio?

A. Yes.

Q. What are they?

A. That a customer maintain a terminal distributor of dangerous drugs license, Category III, for controlled substances.

Q. And does that change -- is that any -- strike that.

Are your reporting requirements different in Ohio because of that requirement?

A. Sorry, I'm not sure I understand the question.

Q. Do you understand, as you sit here today, that you have additional reporting requirements to Ohio?
A. For?
Q. For controlled substances, for the sale.
A. To report transactions?
Q. Yes.
A. Yes.
Q. Do you know how long that's been in existence in Ohio?
A. No, I'm not sure.
Q. And, to your knowledge, has Schein complied with that requirement?
A. Yes.
Q. Does Ohio have a suspicious order monitoring -- a suspicious order reporting requirement?
A. I believe so.
Q. And for all times that you've -- that you -- going back to 1996, or whenever the requirements started, has Schein complied with the Ohio suspicious order requirements?

MR. JONES: Object to the form. Scope. Calls for a legal conclusion.

THE WITNESS: Yeah, I'm not sure, going back.

BY MR. MIGLIORI:

Q. Have you looked for those reporting -- that reporting data in Ohio?

A. No.

Q. All right. There's a controlled substance state licensure and then a federal DEA licensure.

So that's part of your verification team?

A. Correct.

Q. You also state here that, on the next page, in your suspicious order monitoring due diligence process, Henry Schein has a Know Your Customer DEA overview.

What is that?

A. It's just something that we provide to customers to explain our process.

Q. And is it a document?
A. Yes.
Q. Is it, like, a pamphlet? Is it a booklet? What does it look like?
A. It's just a two-page, or a one-page, front-and-back, document.
Q. Did you look at that in preparation for today?
A. No.
Q. But it exists? If I were to say, can you send me over the Henry Schein Know Your Customer DEA overview as of 2015, that exists in your files, right?
A. Yes.
Q. Okay. The suspicious order, due diligence suspicious order monitoring, these are different things that you look for, for verification, correct?
A. Yes.
Q. One of them says, License background review, disciplinary actions.
You do, at least as of 2015,

look back to see whether or not there have been any disciplinary, whether it be licensure or, I assume, criminal disciplinary actions for your customers, correct?

A. Correct.

Q. And that information would be in the due diligence file that we've already talked about, right?

A. Right.

Q. You have an online controlled substances form.

So you create an Internet-based interface with the clients, correct?

A. Correct.

Q. And there's a requirement that the customer, at least as of 2015, have a complete form, all fields are filled in and an E-signature, right?

A. Right.

Q. And so for every customer, in some accounting, for example, today, there would be an online file relative to

the due diligence for each and every customer, correct?

A. Could be a paper version as well.

Q. Okay. It wasn't always the case that every customer had a due diligence file, correct?

A. That's correct.

Q. We'll get into that.

And then onboarding is bringing on a new client, right?

A. Right.

Q. On Page 4 of Exhibit-6, there are some additional due diligence requirements for bringing on a new client as of 2015.

It says, Speaking with the sales team and attending onboarding conference calls.

So the sales team is part of the onboarding process, right? They bring in the new client?

A. Yes.

Q. And then you interact with

the sales team in whether or not that client, in fact, can be onboarded after some due diligence, correct?

A. Correct.

Q. In 2015, the elements of that due diligence for onboarding included the questionnaire, correct?

A. And licensing.

Q. And licensing.

So they would have to fill out a one-page questionnaire?

A. It became two pages.

Q. And then that questionnaire goes in the due diligence file immediately?

A. Yes.

Q. And then you would have to go through a verification of the various licenses for that state and federally, correct?

A. Correct.

Q. And then, finally, on this, this is a list, at least in 2015, of the people within verification. It lists you

as the verifications manager.

What does Maggie Wilding do?

A. She is the supervisor of our team in Reno for verifications.

Q. Does she report to you?

A. Yes.

Q. So Reno reports, generally, to the Melville facility?

A. To me, yes.

Q. You oversee all the verifications?

A. Yes.

Q. Christine Stratton, she is a suspicious order monitoring team lead.

What department is she in?

A. She is still in verifications.

Q. And what does she do? What does a team lead do?

A. So, currently, she actually is a supervisor. But it would be her role to assist in the SOM and Know Your Customer processes.

Q. Is she a supervisor in New

York?

A. Yes.

Q. But she still reports to you?

A. Yes.

Q. And Maggie, is she still the supervisor in Reno?

A. Yes.

Q. How about Leah Mannino?

A. She is no longer with the company.

Q. But she would have done the same things that Christine was doing with respect to team lead?

A. Yes.

Q. And she was in New York?

A. Yes.

Q. Has somebody filled in for her now, that's there now?

A. Yes.

Q. Who is that?

A. BriAnne Elia.

Q. Judy Labarbera, a licensing team lead.

First of all, is Judy still there?

A. No.

Q. Does somebody else have that role?

A. Yes.

Q. Who is that?

A. George Rodriguez.

Q. And what does a licensing team lead do?

A. They work with the team on verification for licensing credentials.

Q. And BriAnne is now a team lead, an SOM team lead, but here it says, Verifications, manage accounts.

What is that job title?

A. That was part of the onboarding that we spoke of earlier. So she would engage with the customer to set expectations for coming over.

Q. Who is doing that now?

A. Brian Fishman.

Q. None of those folks have any responsibilities with respect to the

database that you also manage, correct?

A. That's correct.

Q. I'll show you Exhibit Number 7.

- - -

(Whereupon, Exhibit Schein-Abreu-7, HSI-MDL-00000086-103, was marked for identification.)

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BY MR. MIGLIORI:

Q. Exhibit Number 7 is one of many I think we may look at today, or not. But this was produced to us by Henry Schein. It's got the Bates number on the bottom of HSIMDL86, is the top page.

It's dated May 21st of 2018 and it's Revision Number 5 to the SOP, right?

Is that correct?

A. Yes, yes.

Q. And you've seen forms like this? Every change to the standard

operating procedures of Schein relative to suspicious order monitoring is reflected somehow -- to the extent that it's a change that goes into the books, is reflected in one of these forms, correct?

A. Correct.

Q. We'll get into different things here, but this is an SOM from this year. It talks about some of the things that we've already talked about today.

But for this purpose right now, I just want to bring you to the page that ends in 98. There's a list of states that have reporting requirements. And it appears that this has been added to the SOP for Henry Schein for Ohio.

Have you reviewed this in preparation for today?

A. Yes.

Q. So you'll see that the Ohio requirements are separate and apart from the DEA requirements.

You agree with that, right?

A. Yes.

Q. And here is the citation, and it's a requirement for wholesalers.

You understand that Schein is considered a wholesaler in this context, correct?

A. Correct.

Q. And that the reporting requirement is to the Ohio Board of Pharmacy in Columbus, Ohio.

Do you see that?

A. Yes.

Q. And then it says that, There's a minimum requirement in the state of Ohio that a system shall be designed and operated to disclose orders for controlled substances and other dangerous drugs subject to abuse.

1, The wholesaler shall inform the State Board of Pharmacy of suspicious orders for drugs when discovered.

That's similar to the DEA requirement, too, correct?

A. Yes.

Q. Suspicious orders are those which, in relation to the wholesaler's record as a whole, are of unusual size, unusual frequency or deviate substantially from establishing buying patterns.

Do you see that?

A. Yes.

Q. You'll agree with me that nothing in there says only after due diligence, correct?

MR. JONES: Objection. The document speaks for itself. The statute speaks for itself.

BY MR. MIGLIORI:

Q. It doesn't say after due diligence, does it?

A. Correct.

Q. 2, Reports generated by the system shall be furnished to the state Board of Pharmacy within three working days of receipt of a request from the board.

So if the board asks for something, you have to respond.

Do you recall ever having to do that at Schein, that is, provide a report to the board specifically upon their request?

A. Not to my recollection, no.

Q. Okay. Then this provision G says, with respect to verification of license, Each wholesale distributor of dangerous drugs registered with the state Board of Pharmacy shall report any suspicious purchases of any dangerous drugs by a prescriber exempted from licensure as a terminal distributor of dangerous drugs. A suspicious purchase includes, but is not limited to, any drugs that the prescriber is not authorized to use in the course of his or her own professional practice.

Have you searched, within your files, any suspicious purchases that meet the definition that I just read to you, for Ohio?

MR. JONES: Object to the form. Object to scope.

THE WITNESS: Sorry, can you repeat the question?

BY MR. MIGLIORI:

Q. Sure.

This requirement for verification under Ohio law requires that suspicious purchases be reported to the Ohio Board of Pharmacy when those purchases include any drugs that the prescriber is not authorized to use in the course of his or her professional practice.

Have you searched through the Ohio -- or through the database at Schein for any suspicious orders reported to the Ohio Board of Pharmacy because of that unauthorized use?

MR. JONES: Object to the form. Misstates the document.

THE WITNESS: Are we talking with respect to Summit County or Ohio as a whole?

BY MR. MIGLIORI:

Q. I'm asking for Ohio.

But if you only did it for Summit, you can tell me that.

A. Yes, I did, I searched for Summit County.

Q. And did you find any in Summit County?

A. No.

Q. And folks that would fall into the category of not being authorized to use drugs would include, for example, an orthodontist should not be ordering things like anti-anxiety medication, correct? Is that within the system?

MR. JONES: Objection to form. Lack of foundation. Calls for a legal conclusion.

THE WITNESS: Arbitrarily or regarding that specific example you gave?

BY MR. MIGLIORI:

Q. Isn't that -- I'm giving you an example as something in the standard

operating procedures of your company as being an unauthorized purchase.

A. We have --

MR. JONES: Same objections.

THE WITNESS: We have restrictions in place.

BY MR. MIGLIORI:

Q. Yes.

And one of the restrictions is, dentists don't normally prescribe anti-anxiety medications, correct?

MR. JONES: Objection to form.

THE WITNESS: Specifically to that example?

BY MR. MIGLIORI:

Q. Yes.

A. Potentially.

Q. In fact, there is a standard operating procedure that says that if a dentist is ordering anti-anxiety and controlled substances, like a morphine equivalence, that that is a red flag, correct?

A. I'm not sure about that.

MR. JONES: Objection.

BY MR. MIGLIORI:

Q. One of the practices, or one of the policies and procedures that Schein adopted more recently is that doctors can't self-medicate or order controlled substances for their own personal use. Isn't that one of the Schein policies?

A. That's one of our policies.

Q. Did you look, within the Ohio reporting databases, for any reports of doctors that you found, upon due diligence, were using opiates or morphine equivalents for self-medicating purposes?

A. With respect to Summit County?

Q. I'm asking for Ohio, but you can limit it to what you looked for.

A. With respect to Summit County, no.

Q. So with respect to Summit County, you did look for it and you did

not find any?

A. Correct.

Q. If, in fact, though, you had a doctor in Summit County that was self-medicating and you became aware of that, that fact would be, first, in the due diligence file, correct?

A. Yes.

Q. And by operation of law, you would have reported that to Ohio and to the DEA?

A. Yes.

Q. And that would have been reported as a suspicious order, correct?

A. Correct.

Q. And you've looked for both the DEA and Ohio, and you found none for Summit County?

A. That's correct.

Q. From 2009 to present?

MR. JONES: Objection.

VIDEO TECHNICIAN: The time is now 11:49 a.m. And we are going off the record.

- - -

(Whereupon, a brief recess was taken.)

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VIDEO TECHNICIAN: The time is now 11:51 a.m. We are back on the record.

- - -

(Whereupon, Exhibit Schein-Abreu-8, HSI-MDL-00231455-458, was marked for identification.)

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BY MR. MIGLIORI:

Q. Let me show you -- we talked a little bit about the Rannazzisi letters. Let me show you Exhibit Number 8.

This is the Dear Registrant letter of September 27th, 2006.

Have you reviewed this?

A. Yes.

Q. And you see that this document has actually got an HSI number

on the bottom? That means we received it from your company.

So you'll agree with me that Henry Schein, Inc., in fact, received and maintained in its files a copy of the September 27, 2006 letter -- I'll show the name -- from Joseph Rannazzisi, deputy assistant administrator, Office of Diversion Control?

A. Yes.

Q. As the letter states, it's being sent to every commercial entity registered with the Drug Enforcement Agency to distribute controlled substances.

That would have included Schein in 2006, correct?

A. Yes.

Q. The purpose of this letter is to reiterate the responsibilities of controlled substance distributors in view of the prescription drug abuse problem our nation currently faces.

You will agree with me that,

as of 2006, it was understood within the industry that the country was in a drug -- a prescription drug abuse national crisis --

MR. JONES: Object to the form.

BY MR. MIGLIORI:

Q. -- wouldn't you?

A. Yes.

Q. And that this letter was not, on its face, designed to give new guidance, but it was to, as he puts it, reiterate the responsibilities of controlled substance distributors in view of that crisis.

Do you see that?

A. Yes.

Q. All right. Rannazzisi says, As each of you undoubtedly -- is undoubtedly aware, the abuse of controlled prescription drugs is a serious and growing health problem in the country. DEA has an obligation to combat this problem, as one of the agency's core

functions is to prevent the diversion of controlled substances into illicit channels. And Congress assigned DEA to carry out this function through the enforcement of the Controlled Substances Act and the DEA regulations to implement that.

So on its face, Schein, you would agree, was aware that in 2006, at least, the purpose of the Controlled Substances Act was to prevent diversion of prescription drugs for illicit use and abuse, correct?

A. Correct.

Q. And, in fact, that relationship between the Controlled Substances Act and the abuse of prescription medications actually went back to 1971, as we saw, correct?

A. When it was initially written?

Q. Correct.

A. Yes.

Q. It says, in the middle of

the next paragraph, Distributors are, of course, one of the key components of the distribution chain. If the closed system is to function properly, as Congress envisioned, distributors must be vigilant in deciding whether a prospective customer can be trusted to deliver controlled substances only for lawful purposes.

You'll agree with me that Henry Schein understood that the distributors play an important role in the prevention of diversion?

MR. JONES: Object to the form. It goes outside the scope.

MR. MIGLIORI: Well, that's directly referencing a Rannazzisi letter that's specifically referenced in the notice. So if you don't -- if you don't have an opinion on that, you can tell me that.

MR. JONES: It's also outside the scope, per Special

Master Cohen's ruling in September.

MR. MIGLIORI: What part of the ruling? Because if I can avoid it, I will.

MR. JONES: Asking him about his -- about past, present interpretation, agreement or disagreement with statements made in the Rannazzisi letters.

I mean, we'll stipulate that that's what the letter says. But as far as you're going to ask him questions about what Henry Schein thinks or believes or disagrees with, then we're going to object to the scope.

BY MR. MIGLIORI:

Q. Well, I'm only going to ask you questions to the extent that this informs what the purpose of your suspicious order monitoring program is, okay? I'm not asking you to confirm that that's what Rannazzisi thought or what

the company thought back in 2006 or before, okay?

It says that, The Controlled Substances Act uses a concept of registration as a primary means by which manufacturers, distributors, and practitioners are given legal authority to handle controlled substances.

So you understand that the registration of all of those entities is what allows the DEA to require reporting and detection of suspicious orders, right?

MR. JONES: Object to the form. Outside the scope.

BY MR. MIGLIORI:

Q. Do you understand that? If you're a registrant, that you have to comply with the Controlled Substances Act?

A. Yes.

MR. JONES: Same objection.

BY MR. MIGLIORI:

Q. All right. In the middle of

the second page, it says, The DEA regulations require all distributors to report suspicious orders of controlled substances. Specifically, the regulations state the registrant shall design and operate a system to disclose to the registrant suspicious orders of controlled substances. The registrant shall inform the field division of the Office of the Administration in this area of suspicious orders when discovered by the registrant. Suspicious orders include orders of unusual size, orders deviating substantially from normal pattern, and orders of unusual frequency.

So we read this earlier. But you'll agree with me that Henry Schein was in receipt of this specific provision and requirement of the CSA of Henry Schein relative to controlled substances and its customers, correct?

MR. JONES: We'll stipulate that Henry Schein received this Rannazzisi letter on or about when

it was dated.

Otherwise, I object --

MR. MIGLIORI: You can answer.

MR. JONES: Otherwise, I object to the question as outside the scope. The document speaks for itself.

MR. MIGLIORI: Okay. And I'll note that.

BY MR. MIGLIORI:

Q. You see that, in fact, Schein received this excerpt in 2016 in this Rannazzisi letter, correct?

A. Correct.

Q. You'll also see it says, in the next -- two following paragraphs, it says, Thus, in addition to reporting all suspicious orders, a distributor has a statutory responsibility to exercise due diligence to avoid filling suspicious orders that might be diverted into other-than-legitimate medical, scientific and industrial channels.

Now, do you understand that to mean that a suspicious order requires due diligence in order for it to be determined to be suspicious?

MR. JONES: Object to the form. Object. Goes specifically and expressly outside the scope that is allowed by the special master's order.

You can ask him in his individual capacity. But this is going outside the scope for which this witness is here and outside what the court has allowed.

MR. MIGLIORI: That's fine. I've got your objection.

And if that's what's ruled, that this is his individual capacity, I'm okay with that.

BY MR. MIGLIORI:

Q. But I'm asking you, as your capacity here, in regards to the stated area of inquiry about the Rannazzisi letter, would you agree with me that, at

least as of 2006, Henry Schein was put on notice that the reporting requirement of a suspicious order was separate and distinct from the obligation to perform due diligence?

MR. JONES: Objection. Form. Calls for legal conclusion. Outside the scope. Runs afoul of the court's order.

BY MR. MIGLIORI:

Q. Sir, you can answer. And the court will determine whether you answer it just for you or for the company.

A. Yes.

Q. Okay. So at least according to this letter that Schein received in 2006, once something deviated from an unusual size, pattern or frequency, that was, by the DEA's perspective, a suspicious order that needed to be reported, and that was separate and distinct from the obligation to then do due diligence to see whether or not that

order could be shipped?

Would you agree with me that that's at least what Schein has been put on notice of in 2006?

MR. JONES: Object to the form. Object. Compound. Calls for a legal conclusion. Outside the scope. Calls for speculation. The document speaks for itself.

BY MR. MIGLIORI:

Q. Go ahead.

A. I'm sorry, can you restate the question?

Q. Sure.

MR. MIGLIORI: And I'll accept the objection that comes back as well.

BY MR. MIGLIORI:

Q. You'll agree with me that at least with respect to this letter that Schein received in 2006, it made it clear that a suspicious order was a deviation of size, frequency and pattern, and that alone had to be reported; separate and

distinct from that, there was an obligation to then do due diligence?

That's at least what the DEA is telling Schein here in 2006, correct?

MR. JONES: Same objections.

THE WITNESS: Yes.

BY MR. MIGLIORI:

Q. That system, though, was not put in place at Schein where the reporting occurred before due diligence until, I think you said, after the Masters decision, correct?

MR. JONES: Objection. Vague. Objection as to time.

THE WITNESS: So what time periods are you referring to?

BY MR. MIGLIORI:

Q. The Schein system didn't report that way, that is, suspicious orders the way it's described here in the Rannazzisi letter, didn't report that way to DEA until after the Masters decision in 2017, correct?

MR. JONES: Object to the

form. Lack of foundation. Vague. Outside the scope. Calls for a legal conclusion.

BY MR. MIGLIORI:

Q. Go ahead.

A. We reported orders that were deemed suspicious.

Q. Right. I understand that. I'm trying to figure out by which definition.

The definition in this Exhibit-7 that I'm reading from right now, where -- I'm sorry, Exhibit-8, where a suspicious order needs to be reported if it's in deviation of size, pattern or frequency at the time that that deviation is discovered, that's what's said here in this letter, correct?

MR. JONES: Objection. Form. Document speaks for itself.

BY MR. MIGLIORI:

Q. Go ahead.

A. Correct.

Q. Schein reported it as a

suspicious order to DEA only after it did due diligence and determined that it was suspicious, until the Masters decision in 2017, correct?

A. Correct.

MR. JONES: Asked and answered. Objection. Asked and answered.

BY MR. MIGLIORI:

Q. Only after Masters did Schein begin to report suspicious orders when they deviated from size, pattern and frequency and then performed due diligence to determine whether or not to ship the order, correct?

A. Correct.

Q. The letter goes on to say, In a similar vein, given the requirement under Section 823(e) that a distributor maintain effective controls against diversion, a distributor may not simply rely on the fact that the person placing the suspicious order is a DEA registrant and turn a blind eye to the suspicious

circumstances.

So verification in and of itself is not due diligence; is that a fair statement?

MR. JONES: Objection. Form. Vague. Overly broad. Misstates the document.

BY MR. MIGLIORI:

Q. Will you agree with that?

A. License verification?

Q. Yes.

A. Yes.

Q. So the fact, merely, that somebody has a DEA registration, one of the customers of Schein, or is registered with the Ohio Board of Pharmacy, that process, while it's part of your due diligence to make sure they, in fact, are licensed, that is not a sufficient amount of due diligence at any time from 1996 to present, that's not enough due diligence at any level, correct?

MR. JONES: Object as to form. Overly broad. Vague.

THE WITNESS: Correct.

BY MR. MIGLIORI:

Q. Do you want me to restate it?

A. No.

Yes.

Q. So if we were to start in 1996, due diligence has always been more than just verification, according to the Controlled Substances Act, correct?

A. Which time are you talking about? The time period from --

Q. From 1996 on.

A. Yes.

Q. That is, because you had a license, you were required to design a system and monitor a system, but the mere fact of a physician or a healthcare provider having a license, that wasn't, by itself, sufficient due diligence with respect to investigating what could potentially be a suspicious order, correct?

MR. JONES: Objection.

Form. Vague. Overly broad.
Compound.
BY MR. MIGLIORI:
Q. Is that correct?
A. Correct.
Q. All right. And then this same letter in 2006 lists certain activities that should raise suspicions of a concern, at least, for diversion of controlled substances.
Do you see that?
A. Yes.
Q. And if you go through some of these, ordering excessive quantities of a limited variety of controlled substances while ordering few, if any, other drugs; that will be a red flag, correct?
A. A potential red flag, yes.
Q. And in terms of putting that into the Henry Schein due diligence program, that really started some time in 2011 and '12, correct?
MR. JONES: Objection.

Form.

THE WITNESS: So when you say "in part of that program"?

BY MR. MIGLIORI:

Q. So the initial due diligence program that we talked about was really if an order triggered and became pended in the Henry Schein system, a form -- a one-page form would be mailed out to the doctor -- let's start in 2006 -- a one-page form would be sent out to the doctor, the doctor would send it back filling in the different information requested.

And that would be a basis for a determination about whether an order was suspicious; is that true?

A. True.

Q. That system evolved, as you said, over time.

And the on-site visits and the phone calls and the Internet searches, that really began around 2012, correct?

A. That's right.

Q. And in 2012, you would look at factors like the -- let's see, ordering excessive quantities of a limited variety of controlled substance in combination with excessive quantity of lifestyle drugs.

Sort of the analysis of dispensing history and on-site visits, that really was an evolution of the Know Your Customer policies that began in 2012, ramping up to 2015, right?

MR. JONES: Objection. Form. Overly broad. Vague.

BY MR. MIGLIORI:

Q. Is that right?

A. It may have been prior to that. I don't remember the exact year.

Q. Well, you know that the suspicious order monitoring program revision that started to look at the due diligence component began in 2009.

Have you heard of the company Buzzeo?

A. Yes.

Q. Did you ever work with Buzzeo?

A. Yes.

Q. And Buzzeo was brought in to help redesign the suspicious order monitoring program and develop the Know Your Customer component as part of its charge, correct?

A. Yes.

Q. And that charge, really, was investigated and analyzed over time; but it really wasn't until 2010, '11, '12, that those aspects of Know Your Customer were codified in changes to the standard operating procedures, correct?

MR. JONES: Object to form. Overly broad. Object as to time.

BY MR. MIGLIORI:

Q. Is that correct?

A. Sounds right, yes.

MR. JONES: Don, lunch is here, if you're at a transition point.

MR. MIGLIORI: How about, let me -- just give me one second, because it might cause me to cut out some of these documents.

Can you give me ten minutes, does that work?

MR. JONES: Ten minutes to --

MR. MIGLIORI: Before we break.

MR. JONES: Yes.

MR. MIGLIORI: Thanks.

This is Exhibit Number 9.

- - -

(Whereupon, Exhibit Schein-Abreu-9, HSI-MDL-000993112-115, was marked for identification.)

- - -

BY MR. MIGLIORI:

Q. This is the February 7, 2007 Rannazzisi letter.

Again, this was -- if you look at the bottom of this document, it's

got the HSI number on it. So that's produced to us by Henry Schein.

Do you see that?

A. Yes.

Q. I will simplify this by just simply saying, you'll agree with me that Henry Schein was, in fact, in receipt of this particular Rannazzisi letter, correct?

A. Right.

Q. And I'll accept that this letter speaks for itself in its contents.

It does talk about the obligations, though, of the distributor of controlled substances, correct?

A. Yes.

Q. It uses the same term here that the letter is to reiterate the responsibilities, correct?

A. Yes.

Q. Meaning it's to remind the company of the responsibilities, not to state new responsibilities.

Do you understand that?